

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 22-cr-20184

v.

Hon. Laurie J. Michelson

D-1 Albert Morrison,

Defendant.

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**MOTION FOR LEAVE TO FILE EXHIBIT
USING THE MEDIA FILE UPLOAD**

Now come the undersigned, Assistant United States Attorneys Sarah Resnick Cohen and Karen Reynolds, and pursuant to the Electronic Filing Policies and Procedures, seeking leave of this Court to file an exhibit via the electronic portal “Media File Upload” in CM/ECF.

The government is filing its sentencing memorandum on August 21, 2023. At this time, Exhibit 1 to the government’s memorandum will be a brief video clip of the July 12, 2017, Madison District Public Schools board meeting which cannot be converted to PDF because it is a video recording. This video has been produced to defense counsel in the normal course of discovery.

The video is submitted to the Court to assist in its consideration of the 18 U.S.C. § 3553(a) factors. In particular, the video is relevant to § 3553(a)(1): the nature and circumstances of the offense and the characteristics of the defendant.

Pursuant to Local Rule 7.1, the government contacted defense counsel regarding this motion via email; defense counsel did not concur.

The video clip does not contain any information required to be redacted under Rule 49.1 of the Federal Rules of Criminal Procedure. And, if the Court permits the electronic filing, the government does not intend to play the media file during Court proceedings.

The government respectfully requests that this Court grant permission to file Exhibit 1 via the electronic portal “Media File Upload” in CM/ECF.

Respectfully Submitted,

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s/Sarah Resnick Cohen
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Dated: August 17, 2023

CERTIFICATE OF SERVICE

I certify that on August 17, 2023, I electronically filed the foregoing document with the Clerk of the Court of the Eastern District of Michigan using the ECF system, which will send notification to all counsel of record via email.

s/Sarah Resnick Cohen
SARAH RESNICK COHEN
Assistant United States Attorney